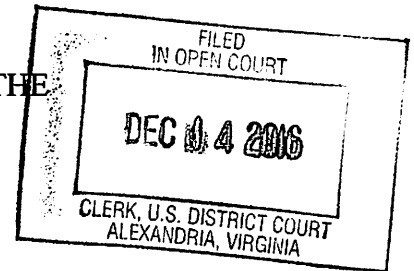


IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF VIRGINIA

Alexandria Division



UNITED STATES OF AMERICA

v.

SEBASTIAN GREGERSON

Defendant.

)  
)  
) Criminal No. 1:16-cr-292

) Count One: 18 U.S.C. § 371  
) (Conspiracy)

) Count Two: 18 U.S.C. § 371  
) (Conspiracy)

) Count Three: 18 U.S.C. § 922(a)(6),  
) 924(a)(2), and 2  
) (Aid and Abet False Statements During  
) the Purchase of a Firearm)

) Count Four: 18 U.S.C. § 922(a)(6),  
) 924(a)(2), and 2  
) (Aid and Abet False Statements During  
) the Purchase of a Firearm)

) Forfeiture Notice:  
) 21 U.S.C. § 924(d)

November 2016 Term — Alexandria

INDICTMENT

COUNT ONE

*(Conspiracy to Provide False Statements During the Purchase of a Firearm - a Beretta M9)*

THE GRAND JURY CHARGES THAT:

On or about April 21, 2013, in Chantilly, Virginia, within the Eastern District of Virginia, and elsewhere, the defendant, SEBASTIAN GREGERSON, did unlawfully and knowingly combine, conspire, confederate, and agree with Unindicted Co-Conspirator 1, to commit an offense against the United States, that is:

to make a false and fictitious written statement, in connection with the acquisition and attempted acquisition of a firearm from a federal firearms licensed dealer, which was intended and likely to deceive such dealer with respect to any fact material to the lawfulness of the sale and other disposition of such firearm under the provision Chapter 44 of Title 18, United States Code, in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

THE WAYS, MANNER, AND MEANS OF THE CONSPIRACY

The purpose of the conspiracy was to evade the federal firearms laws governing the sale of firearms.

The ways, manner, and means by which the defendant and the other member of the conspiracy accomplished the conspiracy included the following:

1. It was a part of the conspiracy that the defendant, who was not a resident of Virginia, asked Unindicted Co-Conspirator 1, who was a resident of Virginia, to purchase a firearm on behalf of the defendant.
2. It was part of the conspiracy that the defendant provided U.S. currency to Unindicted Co-Conspirator 1 to purchase the firearm.
3. It was further part of the conspiracy that the defendant instructed Unindicted Co-Conspirator 1 on what firearm to purchase.
4. It was further a part of the conspiracy that Unindicted Co-Conspirator 1 completed a Bureau of Alcohol, Tobacco, Firearms and Explosives Form 4473 application and made false statements on said application.

OVERT ACTS

In furtherance of the conspiracy, and to effect the objects thereof, the defendant,

SEBASTIAN GREGERSON, and his unindicted co-conspirator committed overt acts in the Eastern District of Virginia and elsewhere including, but not limited to, the following:

5. On or about April 21, 2013, SEBASTIAN GREGERSON and Unindicted Co-Conspirator 1 attended The Chantilly Gun Show in Chantilly, Virginia, within the Eastern District of Virginia.

6. On or about April 21, 2013, SEBASTIAN GREGERSON instructed Unindicted Co-Conspirator 1 to purchase a firearm, specifically a Beretta M9 pistol, from Dale's Guns, a federal licensed firearms dealer.

7. On or about April 21, 2013, SEBASTIAN GREGERSON provided Unindicted Co-Conspirator 1 with U.S. Currency to purchase the Beretta M9 pistol from Dale's Guns.

8. On or about April 21, 2013, Unindicted Co-Conspirator 1 purchased the Beretta M9 pistol from Dale's Guns.

9. On or about April 21, 2013, when purchasing the Beretta M9 pistol from Dale's Guns, Unindicted Co-Conspirator 1 answered yes to the question "Are you the actual transferee/buyer of the firearm(s) listed on this form?"

10. On or about April 21, 2013, immediately after purchasing the Beretta M9 pistol from Dale's Guns, Unindicted Co-Conspirator 1 provided SEBASTIAN GREGERSON with the Beretta M9 pistol.

(All in violation of Title 18, United States Code, Section 371).

COUNT TWO

*(Conspiracy to Provide False Statements During the Purchase of a Firearm - a Glock 31)*

THE GRAND JURY CHARGES THAT:

On or about February 16, 2014, in Chantilly, Virginia, within the Eastern District of Virginia, and elsewhere, the defendant, SEBASTIAN GREGERSON, did unlawfully and knowingly combine, conspire, confederate, and agree with Unindicted Co-Conspirator 1, to commit an offense against the United States, that is:

to make a false and fictitious written statement, in connection with the acquisition and attempted acquisition of a firearm from a federal firearms licensed dealer, which was intended and likely to deceive such dealer with respect to any fact material to the lawfulness of the sale and other disposition of such firearm under the provision Chapter 44 of Title 18, United States Code, in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

THE WAYS, MANNER, AND MEANS OF THE CONSPIRACY

The purpose of the conspiracy was to evade the federal firearms laws governing the sale of firearms.

The ways, manner, and means by which the defendant and the other member of the conspiracy accomplished the conspiracy included the following:

11. It was a part of the conspiracy that the defendant, who was not a resident of Virginia, asked Unindicted Co-Conspirator 1, who was a resident of Virginia, to purchase a firearm on behalf of the defendant.

12. It was part of the conspiracy that the defendant provided U.S. currency to Unindicted Co-Conspirator 1 to purchase the firearm.

13. It was further part of the conspiracy that the defendant instructed Unindicted Co-Conspirator 1 on what firearm to purchase.

14. It was further a part of the conspiracy that Unindicted Co-Conspirator 1 completed a Bureau of Alcohol, Tobacco, Firearms and Explosives Form 4473 application and made false statements on said application.

#### OVERT ACTS

In furtherance of the conspiracy, and to effect the objects thereof, the defendant, SEBASTIAN GREGERSON, and his unindicted co-conspirator committed overt acts in the Eastern District of Virginia and elsewhere including, but not limited to, the following:

15. On or about February 16, 2014, SEBASTIAN GREGERSON and Unindicted Co-Conspirator 1 attended The Dulles Expo in Chantilly, Virginia, within the Eastern District of Virginia.

16. On or about February 16, 2014, SEBASTIAN GREGERSON instructed Unindicted Co-Conspirator 1 to purchase a firearm, specifically a Glock 31 .357 caliber pistol, from Trojan Arms & Tactical, a federal licensed firearms dealer.

17. On or about February 16, 2014, SEBASTIAN GREGERSON provided Unindicted Co-Conspirator 1 with U.S. Currency to purchase the Glock 31 .357 caliber pistol, from Trojan Arms & Tactical.

18. On or about February 16, 2014, Unindicted Co-Conspirator 1 purchased the Glock 31 .357 caliber pistol from Trojan Arms & Tactical.

19. On or about February 16, 2014, when purchasing the Glock 31 .357 caliber pistol from Trojan Arms & Tactical, Unindicted Co-Conspirator 1 answered yes to the question "Are you the actual transferee/buyer of the firearm(s) listed on this form?"

20. On or about February 16, 2014, immediately after purchasing the Glock 31 .357 caliber pistol from Trojan Arms & Tactical, Unindicted Co-Conspirator 1 provided SEBASTIAN GREGERSON with the Glock 31 .357 caliber pistol.

(All in violation of Title 18, United States Code, Section 371).

COUNT THREE

*(Aid and Abet False Statement During the Purchase of a Firearm – a Beretta M9)*

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 21, 2013, in Chantilly, Virginia, within the Eastern District of Virginia, a person (hereinafter “Unindicted Co-Conspirator 1”), in connection with the acquisition of a firearm, that is, a Beretta M9 pistol, from Dale’s Guns, a licensed dealer of firearms within the meaning of Chapter 44 of Title 18, United States Code, knowingly and unlawfully made a false and fictitious written statement to Dale’s Guns, which statement was intended and likely to deceive Dale’s Guns, as to a fact material to the lawfulness of such sale of the said firearm to Unindicted Co-Conspirator 1 under Chapter 44 of Title 18, in that Unindicted Co-Conspirator 1 knowingly stated and represented on a Bureau of Alcohol, Tobacco, Firearms and Explosives Form 4473 application the answer “yes” in response to the question, “Are you the actual transferee/buyer of the firearm(s) listed on this form?,” whereas, as Unindicted Co-Conspirator 1 then well knew, the said firearm was purchased for the defendant, SEBASTIAN GREGERSON, and the defendant, SEBASTIAN GREGERSON, did knowingly and unlawfully aid, abet, counsel, command, induce, and procure Unindicted Co-Conspirator 1 in the commission of said offense.

(In violation of Title 18, United States Code, Sections 922(a)(6), 924(a)(2), and 2)

COUNT FOUR

*(Aid and Abet False Statement During the Purchase of a Firearm – a Glock 31)*

THE GRAND JURY FURTHER CHARGES THAT:

On or about February 16, 2014, in Chantilly, Virginia, within the Eastern District of Virginia, a person (hereinafter “Unindicted Co-Conspirator 1”), in connection with the acquisition of a firearm, that is, a Glock 31 .357 caliber pistol, from Trojan Arms & Tactical, a licensed dealer of firearms within the meaning of Chapter 44 of Title 18, United States Code, knowingly and unlawfully made a false and fictitious written statement to Trojan Arms & Tactical, which statement was intended and likely to deceive Trojan Arms & Tactical, as to a fact material to the lawfulness of such sale of the said firearm to Unindicted Co-Conspirator 1 under Chapter 44 of Title 18, in that Unindicted Co-Conspirator 1 knowingly stated and represented on a Bureau of Alcohol, Tobacco, Firearms and Explosives Form 4473 application the answer “yes” in response to the question, “Are you the actual transferee/buyer of the firearm(s) listed on this form?,” whereas, as Unindicted Co-Conspirator 1 then well knew, the said firearm was purchased for the defendant, SEBASTIAN GREGERSON, and the defendant, SEBASTIAN GREGERSON, did knowingly and unlawfully aid, abet, counsel, command, induce, and procure Unindicted Co-Conspirator 1 in the commission of said offense.

(In violation of Title 18, United States Code, Sections 922(a)(6), 924(a)(2), and 2)



**FORFEITURE NOTICE**

THE GRAND JURY FURTHER FINDS that there is probable cause that the property described below is subject to forfeiture. Pursuant to Rule 32.2(a), the defendant is hereby notified that, if convicted of any one of the Counts in the Indictment, that he shall forfeit to the United States all firearms and ammunition involved in or used in such violation. This property includes, but is not limited to, the following firearms:

- a. Beretta M9 .9mm caliber pistol, bearing serial number M9155913; and
- b. Glock Model 31, .357 caliber pistol, bearing serial number WBB308.

(In accordance with Title 18, United States Code, Section 924(d); Title 28, United States Code, Section 2461(c); and Rule 32.2(a), Federal Rules of Criminal Procedure.)

A TRUE BILL Pursuant to the E-Government Act,  
the original of this page has been filed  
under seal in the Clerk's Office.

\_\_\_\_\_  
Foreperson of the Grand Jury

Dana J. Boente  
United States Attorney

By:

  
\_\_\_\_\_  
John T. Gibbs  
Assistant United States Attorney